

KOBRE & KIM LLP

800 THIRD AVENUE
NEW YORK, NEW YORK 10022
WWW.KOBREKIM.COM

TEL +1 212 488 1200
FAX +1 212 488 1220

NEW YORK
LONDON
HONG KONG
SEOUL
WASHINGTON DC
SAN FRANCISCO
MIAMI
CAYMAN ISLANDS
BVI

November 28, 2017

BY ECF

Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall
United States Courthouse
40 Foley Square, Room 219
New York, NY 10007

Re: *Paul Grimmett v. New York City Department of Correctional Services, et al.*, Case No. 15-cv-07351 (JPO) (SN) – Letter-Motion Requesting Extension of Discovery

Dear Magistrate Judge Netburn:

We are counsel to Plaintiff Paul Grimmett and write pursuant to Your Honor's Individual Rules and Procedures and the Local Civil Rules to request an extension of discovery. Per the Court's Case Management Order, fact discovery is currently scheduled to close on November 30, 2017, and expert discovery to close on February 9, 2018. There have been no previous requests for extension.

We respectfully request that the Court extend the end of fact discovery by approximately 75 days until February 5, 2018 (along with the consecutive deadlines thereafter). There are no outstanding discovery disputes at this time. Moreover, we have conferred with opposing counsel, and they consent to this request for extension.

Sincerely,

/s/ Joseph W. Slaughter
Joseph W. Slaughter
Kobre & Kim LLP
+1 212 488 1253
Counsel for Plaintiff